

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Daniel Stemple, on behalf of himself and all others similarly situated,)	CASE NO. 1:23-cv-2043
)	
Plaintiff,)	JUDGE CHARLES ESQUE FLEMING
)	
v.)	
Capital Growth Group, LLC)	Capital Growth Group, LLC's
)	Unopposed Motion for Leave to Plead
Defendant.)	
)	

Defendant Capital Growth Group, LLC moves this Court under Fed. R. Civ. P. 6(b)(1)(A) for an extension of time until January 19, 2024, to move, plead, or otherwise respond to Plaintiff Daniel Stemple's complaint. Capital Growth's response to the complaint is currently due on December 26, 2023. Counsel for Capital Growth has conferred with Stemple's counsel, who stated that he has no objection to the requested extension of time.

Good cause exists for granting this extension of time. Counsel for Capital Growth requires additional time to investigate the allegations in the complaint and prepare its response. The requested extension of time therefore is not for purposes of delay. In addition, no previous extensions of time have been granted.

For these reasons, Capital Growth requests that this Court grant it leave until January 19, 2024, to move, plead, or otherwise respond to the complaint.

Dated: December 14, 2023

Respectfully submitted,

/s/ Michael J. Zbiegien Jr.
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Capital Growth Group, LLC

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2023, the foregoing was filed electronically through the Court's ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Michael J. Zbiegien Jr.

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